Cahoy Supp. Dec. Ex. 102

1	UNITED STATES DISTRICT COURT
_	FOR THE NORTHERN DISTRICT OF CALIFORNIA
2	SAN FRANCISCO DIVISION
3	
	IN RE: DA VINCI SURGICAL ROBOT
4	ANTITRUST LITIGATION
5	
6	
	Lead Case No.: 3:21-cv-03825-VC
7	
8	THIS DOCUMENT RELATES TO:
	ALL CASES
9	
10	SURGICAL INSTRUMENT SERVICE
	COMPANY, INC.,
11	
	Plaintiff,
12	
	vs. Case No.: 3:21-cv-03496-VC
13	
7.4	INTUITIVE SURGICAL, INC.,
14	Defendent
15	Defendant.
16	
17	REMOTE VIDEOTAPED DEPOSITION OF
18	JOHN FRANCIS, M.D.
19	odin indivers, m.b.
20	
	Pages 1 through 70
21	
22	Friday, October 14, 2022
	3:03 p.m 4:26 p.m.
23	
24	
	Stenographically Reported By:
25	Denise Sankary, RPR, RMR, CRR
	Page 1

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1	Do you understand that?
2	A. Yes.
3	Q. Any reason that you can't give full and
4	accurate testimony today?
5	A. No.
6	Q. Great. Would you describe for me,
7	briefly, please, your medical training?
8	A. Briefly, I was trained in human medicine
9	at Michigan State University from 1994 to 1998. I
LO	transitioned to residency training in general
L1	surgery with the now-Spectrum Group formerly, it
L2	was Granick in general surgery from 1998 to 2003
L3	and left there and started private practice in 2003.
L4	Q. And since 2003, you've been a general
L5	surgeon at Unity Healthcare at The Lafayette
L6	Surgical Clinic; is that right?
L7	A. That's correct.
L8	Q. And for how long have you had an
L9	affiliation with Franciscan Alliance?
20	A. For about the same amount of time.
21	Q. Okay. Am I correct that you were the
22	chief of surgery for Franciscan from 2010 to 2020?
23	A. That's correct.
24	Q. And just briefly, what were your
25	responsibilities as the chief of surgery for
	Page 6

remember exactly when I started performing operations on patients, but somewhere in that range.

- Q. Approximately how many procedures have you performed using the da Vinci?
- A. It's going to be getting close to a thousand now.
- Q. When you first began using the da Vinci system, were you skeptical about the system, or what were you -- what was your perspective on it?
- A. Yes. I was trained in open surgeries and laparoscopy, and I did not initially see any value to adding an interface like robotics. Once I started using it and realized that there was dual vision that you could use versus a single eye, the three-dimensional aspects was quite a bit -- I would say it got easier to assess tissue and perform certain procedures.

In addition to that, I found that less trauma to the patients occurred because you were touching fewer amounts of tissue, and as a result, the patients recovered quicker with less pain. And initially, I was skeptical of that, but after performing several different types of procedures, realized that that actually was true for a majority, if not all of the patients.

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1 And when you say that there was less 2 trauma to the patients when using the da Vinci 3 system, are you comparing it to laparoscopy, open, 4 or both? 5 Α. Both. 6 Do you perform hernia repairs using the --7 excuse me. Let me rephrase. 8 Do you perform hernia repairs at 9 Franciscan? 10 Α. Yes. 11 Ο. And do you perform hernia repairs using 12 the da Vinci system? 13 Α. Yes. 14 Have you performed hernia repairs using Ο. 15 laparoscopic -- laparoscopic techniques? 16 Α. Yes. 17 Have you performed hernia repairs using 18 open techniques? 19 Α. Yes. 20 Ο. Are there -- excuse me. 21 You mentioned that you're -- you're 22 currently using the da Vinci Xi system; is that 23 correct? 24 Α. That's correct. 25 Have you used in the da Vinci systems in Ο. Page 12

the past?

2.

- A. I was trained on the da Vinci Si system initially, and then as soon as the Xi system was available, we immediately switched to that system.
 - Q. And why is that?
 - A. Improved technology.
- Q. What are the benefits to the Xi compared to the Si?
- A. A few of the benefits include easier transition of instruments, better range of motion for the arms, less movement of the machine in terms of repositioning during an operation, greater range in terms of the amount of space you can do an operation when it comes to abdominal or peritoneal approaches. So ease of use, greater flexibility, and actually, more efficient use of the machine.
- Q. When you first see a patient, what are the steps that you take to -- to figure out the best treatment for that individual?
- A. Well, first, you have to make a diagnosis on what the issue might be, whether it's a surgically corrected procedure or not, or surgically corrected disease process, and once you see that it can be operated on in an appropriate manner and if the operation is necessary, then you discuss it with

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CERTIFICATE OF REPORTER
STATE OF FLORIDA
I, DENISE SANKARY, Registered Merit
Reporter, do hereby certify that I was authorized
to and did stenographically report the foregoing
Remote Videotaped of JOHN FRANCIS, M.D.; pages 1
through 66; that a review of the transcript was
requested; and that the transcript is a true
record of my stenographic notes.
I FURTHER CERTIFY that I am not a
relative, employee, attorney, or counsel of any
of the parties, nor am I a relative or employee
of any of the parties' attorneys or counsel
connected with the action, nor am I financially
interested in the action.
Dated this 1st day of November, 2022.
Donis Santan
Tomas and start
DENISE SANKARY, RPR, RMR, CRR
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